

C. Hoare & Co. Candidate Privacy Notice

About this document

This privacy notice explains how C. Hoare & Co. ("the bank", "we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. This privacy notice applies to all job applicants and candidates for roles as employees, contractors and temporary workers ("you", "your"). If your job application is successful and you accept our offer of employment or another form of engagement with us, then your personal information will be processed in accordance with a separate Employee Privacy Notice, which will be issued to you as part of your on-boarding pack.

C. Hoare & Co. (UK registered company number 00240822, and which is registered with the UK Information Commissioner's Office with registration number Z5385458) is the data controller of your personal data and is subject to the Data Protection Act 1998 ("DPA") (and, from 25 May 2018, the General Data Protection Regulation (the "GDPR")). This means that we are responsible for deciding what personal information we hold about you and how we use it. We are required under data protection legislation to notify you of the information contained in this privacy notice. We may update this privacy notice at any time.

We use Workable, an online application provided by Workable Software Limited, to assist with our recruitment process. We use Workable to process personal information as a data processor on our behalf. Workable is only entitled to process your personal data in accordance with our instructions.

Where you apply for a vacancy posted by us, these Privacy Notice provisions will apply to our processing of your personal information.

How we collect your information

We collect your personal data in a number of ways, for example:

- From the information you provide to us when you interact with us before making an application to work for us, including when you apply for or attend a work experience placement with the bank.
- When you submit a formal application to work for us, and provide your personal data including in application forms, covering letters and through Workable's online job site.
- From third parties, for example from recruitment agencies, from your previous or current employers (including referees) and institutions of study, or from background check providers, credit reference agencies or the Disclosure and Barring Service, where relevant, in order to verify details about you and/or your application to work for us.

The types of information we collect

In connection with your application for work with us, we will collect the following types of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on your application form, including name, title, address, telephone number, personal email address, date of birth, gender, photograph, employment and work history, and qualifications.
- Any information you provide to us during an interview (for example, your identification data, including a copy of your driving licence and passport details page).
- If you contact us we keep a record of that correspondence.

We also collect the following "special categories" of more sensitive personal information, where this is necessary for your job application:

- Information about your racial or ethnic origin, religious, philosophical or moral beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records
- Information about criminal convictions and offences.

We also collect information about you from other sources:

- Workable provides us with the facility to link the data you provide to us with other publicly available information about you that you have published on the Internet – this may include sources such as LinkedIn and other social media profiles.
- Workable's technology allows us to search various databases e.g. LinkedIn, Indeed.com, Facebook and Twitter, which may include your personal data, to find possible candidates to fill our job openings. Where we find you in this way, we will obtain your personal data from these sources.

How we use your information

The purposes for which we use personal data (including sensitive personal data, where applicable) we collect in connection with your job application includes:

- Providing you with information about the bank and what it is like to work for us.
- Checking you are legally entitled to work in the UK.
- Administering job applications, assessing your skills, qualifications and suitability for the job or role you have applied for or in respect of other roles, and, where relevant, offering you a job with us.
- To communicate with you during the recruitment process.
- To enhance any information that we receive from you with information obtained from third party data providers e.g. LinkedIn, Indeed.com, Facebook and Twitter. This could include, for example, your contact information.
- To find appropriate candidates to fill our job vacancies.
- To conduct data analytics studies to help improve our recruitment processes.
- Retaining your application form and related documents and information, either:

- in your personnel file, if you are offered and accept a job with us; or
- in our 'talent pool' database, so that we can keep you in mind as a candidate for other job offers and opportunities to work for the bank that may arise in the future, and for which we think you would be a suitable candidate to apply for.

We will process sensitive personal data, in particular, for the purposes of recording your racial or ethnic origin, religious, philosophical or moral beliefs or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting and to monitor the bank's compliance with equal opportunities legislation.

The basis for processing your information

We process your personal data for the above purposes because:

- It is necessary in order to take steps at your request prior to entering into a contract with you (i.e. an employment contract or equivalent, provided you are offered a job).
- It is necessary for our or a third party's legitimate interests and your interests and fundamental rights do not override those interests. Our "legitimate interests" include our commercial interests in operating the bank in a professional, sustainable manner, providing the highest quality services to our clients in accordance with all legal and regulatory requirements (which includes appointing the highest quality candidates to the jobs or roles that we identify as being necessary to achieve those interests).

Importantly, we also process your personal data where we need to comply with our legal obligations. In this respect, we use your personal data for the following:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws, all applicable FCA and PRA rules, and tax reporting requirements.
- For the prevention and detection of crime.
- In order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities, including the FCA and the PRA.

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we will share your personal data with certain third parties, including third party service providers. We require third parties to maintain the security of your data and to process it in accordance with applicable data protection legislation. We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We will disclose personal data to a variety of recipients including:

- The Referencing Agency Limited (UK registered company number 04973564, and which is registered with the UK Information Commissioner's Office with registration number Z8372827) for the purposes of their performing DBS checks on behalf of the bank as part of the background checks we carry out to ensure your fitness and propriety for your role.
- Other employees, agents and contractors where there is a legitimate reason for their receiving the information, including third parties where we have engaged them to process data on our behalf.

- When the bank is legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction, including HM Revenue and Customs, the FCA and the PRA).

Data security, and how we store your information

Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to process it. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Where we store your personal data

Where we store your personal data in our own systems, it is stored on our secure servers within the European Economic Area ("EEA"). It may also be processed by one of our suppliers based outside the EEA or which use data storage facilities outside the EEA.

The data that we collect from you and process using Workable's services may be transferred to, and stored at, a destination outside the EEA. In particular, your data may be:

- i) accessible to Workable's staff in the USA; or
- ii) stored by Workable's hosting service provider on servers in the USA as well as in the EEA.

The USA does not have the same data protection laws as the United Kingdom and EEA. A Data Processor Agreement has been signed between us and Workable, and we rely on Workable, Inc.'s registration for the EU-US Privacy Shield as the lawful ground for transferring personal data to Workable in the USA. In addition, Workable Software Limited has Data Processor Agreements in place with its overseas group companies, and between Workable Software Limited and each of its data processors. These data processor agreements are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data.

If you would like further information please contact us (see 'Contact' below).

How long your information is kept

If your job application is successful and you accept our offer of employment or another form of engagement with us, then your personal information will be retained and processed for the purpose of your role in accordance with our Employee Privacy Notice.

If you are not offered a job or if you do not ultimately take up a role with us, we will retain your personal information for a period of twelve months after our last interaction with you concerning the job or role you have applied for.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will retain your personal information for a period of twelve months after our last interaction with you. If you do not want your information to be retained for this purpose you can request, at any time, that we do not do so.

Your rights

Under the DPA you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you.
- To require that we cease processing your personal data if the processing is causing you damage or distress.
- To require us to correct the personal data we hold about you if it is incorrect.
- To require us not to send you marketing communications.

Once the GDPR takes effect in May 2018, you will also have the following additional rights:

- To require us to erase your personal data. This enables you to ask us to erase your personal information where there is no good reason for us continuing to process it.
- To require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal).
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- To object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

Contact and complaints

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact the Data Protection Officer:

- By email: DPO@hoaresbank.co.uk
- By telephone: 0207 353 4522
- Or by post: Data Protection Officer, 37 Fleet Street, London EC4P 4DQ.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner's Office (ICO) online: <https://ico.org.uk/concerns> or using the ICO Helpline: 0303 123 1113.

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at www.ico.org.uk.